

EXHIBIT 4

Lincoln Bandlow <lbandlow@foxrothschild.com>

2/14/2018 4:38 PM

RE: [EXT] Re: Proposed Joint Stip and Order re Confidentiality.

To J. Curtis Edmondson <jcedmondson@edmolaw.com> • Bryan Case <bcase@foxrothschild.com> Copy
Kiren Rockenstein <kiren@edmolaw.com>

Curtis,

I will be lead counsel on this matter. As I have told you, we will always stipulate to a protective order. Please send it to me again for my review and we can then have it filed with the court.

Lincoln Bandlow
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From: J. Curtis Edmondson [mailto:jcedmondson@edmolaw.com]
Sent: Wednesday, February 14, 2018 1:33 PM
To: Case, Bryan ; Bandlow, Lincoln
Cc: Kiren Rockenstein
Subject: [EXT] Re: Proposed Joint Stip and Order re Confidentiality.

Bryan,

I did not get a response from my 2/10 or 2/12 emails. I understand that you are counsel of record for the pornographic film company, Strike 3 Holdings. I saw that Lincoln made a pro-hac appearance on this case. I am not sure who will be lead counsel for Strike 3.

In my earlier email, I laid out for you that my client has no knowledge of the movies alleged in your complaint. Given the inaccuracy and unreliability of the IPP system, false positives are fairly common. This has been borne out by regular and frequent dismissals of Doe's by David Lowe in this district when claims were made by Voltage, Millenium, etc. using the same "monitoring software".

If you do not dismiss under Rule 41, I will answer and file a cross complaint and this case will move towards trial.

As you have been unresponsive to my earlier email re the stip and order, I will now have to make a motion on this issue.

In Best Regards,

J. Curtis Edmondson, Patent Attorney

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[cid:image002.jpg@01D3A598.C3C55D60]

On February 12, 2018 at 11:00 PM "J. Curtis Edmondson" > wrote:

Bryan,

Let me know if this joint stip for a protective order is acceptable. It is modeled after the protective order used in the ND CAL.

If not, then please propose any changes by Wednesday.

In Best Regards,

J. Curtis Edmondson, Patent Attorney
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- Part_1.2.html (9 KB)
 - image002.jpg (9 KB)